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**Attorneys for Defendant**  
*Cook County Health*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DENISE FAIVRE, individually and on behalf  
of all others similarly situated,

Plaintiff,

vs.

PERRY JOHNSON & ASSOCIATES, INC.,  
NORTHWELL HEALTH, INC., and COOK  
COUNTY HEALTH,

Defendants.

CASE NO. 2:23-cv-01926

**STIPULATION TO EXTEND  
DEFENDANT COOK COUNTY  
HEALTH'S DEADLINE TO RESPOND  
TO COMPLAINT**

TO THIS HONORABLE COURT, TO THE CLERK OF THE UNITED STATES  
DISTRICT COURT FOR THE DISTRICT OF NEVADA, AND TO ALL PARTIES  
THROUGH THEIR COUNSEL OF RECORD HEREIN:

Pursuant to Federal Rule of Civil Procedure, Rule 6(b) and Local Rule 6-1, Plaintiff  
Denise Faivre, on the one hand, and Defendant Cook County Health ("CCH") on the other hand,  
stipulate to an extension of time for CCH to respond to Plaintiff's complaint in this matter.

Plaintiff filed her complaint on November 20, 2023, and served CCH on November 30,  
2023. CCH's response is due on December 21, 2023.

On or about November 30, 2023, CCH retained Gordon & Rees LLP as counsel in this  
matter. CCH has requested an extension of time to respond to the Complaint, up to and

1 including January 29, 2024. CCH requires additional time to investigate factual and legal issues  
2 and respond to the Motion for Transfer and Centralization filed by certain plaintiffs before the  
3 Judicial Panel on Multidistrict Litigation. Counsel for Plaintiff has agreed to the extension.

4 There does not appear to have been entered a scheduling order in this case; thus, there are  
5 no dates set for trial, motions, or discovery.

6 IT IS HEREBY STIPULATED that CCH shall have up to and including January 29,  
7 2024, to respond to Plaintiff's complaint.

8 **IT IS SO STIPULATED.**

9  
10 Respectfully submitted,

11 Dated: December 21, 2023

**GORDON REES SCULLY MANSUKHANI**

12  
13 By: /s/ Sean Flynn  
14 Sean Flynn  
15 Attorneys for Defendant  
16 Cook County Health

17 Dated: December 21, 2023

**STRANCH, JENNINGS & GARVEY, PLLC**

18  
19 By: /s/ Nathan Ring  
20 Nathan Ring  
21 Attorneys for Plaintiff  
22 Denise Faivre

23 **IT IS SO ORDERED:**

24 DATED: December 21, 2023

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UNITED STATES MAGISTRATE JUDGE